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MEMORANDUM ENDORSED

February 12, 2025

Via filing on ECF

United States District Court – Southern District of New York Attn: Hon. Gregory H. Woods 500 Pearl Street New York, New York 10007

Re: Professional Fighters League v. Millions.co Inc.

Dkt. No. 1:24-cv-08121

Dear Justice Woods:

This office serves as counsel for the Plaintiff in the above referenced matter. I write with regard to the entry in Dkt. No. 13 for this matter wherein the Court has instructed the parties to provide a joint status letter and case management plan by February 27, 2025, or, in the alternative for Plaintiff to file a motion for default by February 14, 2025.

As Your Honor may recall, in my previous letter to the Court dated January 17, 2025, I advised the Court that I was actively engaged in a trial during that time for a case entitled *Patterson v. Raquette Realty, LLC*, Index No. 508154/2014. The trial for that case ended on January 24, 2025. Almost immediately thereafter, I was struck with a bad case of the flu that caused me to be bedridden for a week.

When I returned from the flu, I began preparations for my next trial which is taking place in Ulster County Supreme Court before the Hon. Kevin R. Bryant in a case entitled *Joseph et al v. Fensterman et al.* Index No. 3485/2014. That case commences on February 24, 2025, and the Court has set aside two weeks for its duration.

As such, I respectfully request more time from the Court to file a motion for a default judgment. Indeed, Defendant has still not provided an answer or otherwise appeared notwithstanding service of the Court's memorandum upon same. As such, I respectfully request an extension of time to March 14, 2025, to file a default judgment in this matter.



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I thank Your Honor for your anticipated courtesies, and I apologize again for any inconvenience that this may cause to the Court.

Sincerely,

Alex Leibson
Alex Leibson

Application granted. Plaintiff's February 12, 2025 request for an extension of time to seek default judgment, Dkt. No. 14, is granted. The date by which the Court expects Plaintiff to seek default judgment by way of an order to show cause why default judgment should not be entered, in full compliance with the procedure articulated in the Court's Individual Rules of Practice in Civil Cases, is extended to March 14, 2025. The initial pre-trial conference scheduled for March 6, 2025 is adjourned to April 10, 2025 at 3:00 p.m. The joint status letter and proposed case management plan described in the Court's November 22, 2024 order are due no later than April 3, 2025. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 14.

SO ORDERED.

Dated: February 13, 2025 New York, New York

United States District Judge